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Attorneys of record:

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ATTORNEYS FOR DEFENDANTS

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BIJAN KARIMIAN,

Plaintiff,

v.

TIME EQUITIES, INC., FRANCIS  
GREENBURGER, ROBERT KANTOR,  
HYMAN SCHERMER,

Defendants.

**Case No. 10-CV-3773 (AKH)**

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that upon Defendants Time Equities, Inc., Francis Greenburger, Robert Kantor and Hyman Schermer (hereinafter "Defendants") Memorandum of Law, Defendants' Rule 56.1 Statement, the Declarations of Marjorie Kaye, Jr., Esq., Francis Greenburger, Robert Kantor, Richard Recny and Bruce Feder, and upon the exhibits attached thereto, and upon all pleadings in this action, Defendants will move this Court before the Honorable Judge Alvin K. Hellerstein at the United States Courthouse, Southern District of New York, 500 Pearl Street, New York, New York 10007, for an Order pursuant to rule 56 of the Federal Rules of Civil Procedure dismissing Plaintiff's Amended Complaint in its entirety with prejudice, as well as for such other and further relief as this Court deems just and proper.

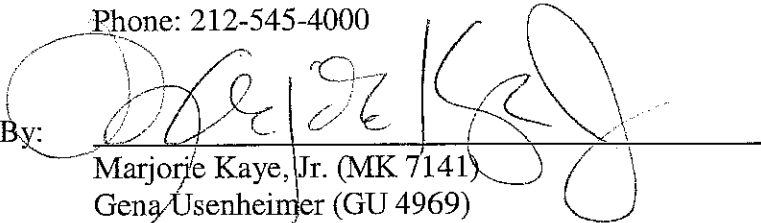
Pursuant to Judge Hellerstein's May 1, 2012 Order, Plaintiff's opposition papers, if any, to be served on or before July 10, 2012, and Defendant's reply papers, if any, are due on or before August 3, 2012.

Respectfully submitted,

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Dated: May 31, 2012  
New York, New York

By:



Marjorie Kaye, Jr. (MK 7141)  
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